

STATEMENT OF BASIS (AI No. 43169)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0124885 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: SeaTech Industries, LLC
1602 W. Pinhook Road
Lafayette, LA 70508

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Ronda Burtch

DATE PREPARED: November 4, 2009

1. PERMIT STATUS**A. Reason For Permit Action:**

Issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit – NPDES permit effective date: N/A
NPDES permit expiration date: N/A

C. LPDES permit – LPDES permit effective date: N/A
LPDES permit expiration date: N/A

D. Date Application Received: June 30, 2009

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - diving systems fabricator**

Fabrication of new construction diving system, which includes structural and pressure vessel components. SeaTech Industries, LLC started operations at this site on January 1, 2009. The site was previously operated by Superior Diving Company, Inc.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II (The points for this facility have been BPJ'd to 0 based on the low volume of wastewater discharged and other similar light commercial facilities.)
3. Wastewater Type: II
4. SIC code: 3499

C. LOCATION - 221 Gunther Lane in Belle Chasse, Plaquemines Parish
Latitude 29° 50' 03", Longitude 90° 03' 03"

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3. **OUTFALL INFORMATION**

Outfall 001

Discharge Type: treated sanitary wastewater

Treatment: sewage treatment plant

Location: at the point of discharge from the sewage treatment plant, located southwest of the office, prior to mixing with other waters

Flow: 500 GPD

Discharge Route: local drainage, thence into Bayou Barataria

Outfall 002

Discharge Type: treated sanitary wastewater

Treatment: sewage treatment plant

Location: at the point of discharge from the sewage treatment plant, located southwest of the fabrication shop, prior to mixing with other waters

Flow: 500 GPD

Discharge Route: local drainage, thence into Bayou Barataria

Outfall 003

Discharge Type: equipment washwater and hydrostatic test wastewater

Treatment: oil/water separator

Location: at the point of discharge from the oil/water separator, located west of the office, prior to mixing with other waters

Flow: intermittent

Discharge Route: local drainage, thence into Bayou Barataria

4. **RECEIVING WATERS**

STREAM - local drainage, thence into Bayou Barataria

BASIN AND SEGMENT - Barataria Basin, Segment 020601

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. **TMDL STATUS**

Subsegment 020601, Intercoastal Waterway - Bayou Villars to Mississippi River, is listed on LDEQ's Final 2006 303(d) List as impaired for fecal coliform. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Barataria Basin, those suspected causes for impairment which are not directly attributed to the diving

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systems fabricator point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

This facility does discharge sanitary wastewater from Outfalls 001 and 002, which may cause or contribute to the fecal coliform impairment. However, due to the small volume of discharge, standard fecal coliform limits on Outfalls 001 and 002 should adequately protect the receiving waterbody from further impairment.

6. CHANGES FROM PREVIOUS PERMIT

This is an initial permit.

7. COMPLIANCE HISTORY/COMMENTS

A. OEC –

Enforcement Actions: There are no enforcement actions administered against SeaTech Industries, LLC as of October 21, 2009. However, there was an enforcement order issued to the previous operator, Superior Diving Company, Inc., on November 13, 2002.

Inspections: An inspection was performed at this facility on May 6, 2009 due to a complaint of sandblasting and paint fumes. According to the inspector, the facility was already in the process of completing the appropriate applications and was referred to small business assistance for help on completing applications. No areas of concern were noted at the time of inspection.

B. DMR Review/Excursions – There are no DMRs on file as of October 21, 2009.

8. EXISTING EFFLUENT LIMITS

There are no existing effluent limits for this facility.

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 020601 of the Barataria Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

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10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for SeaTech Industries, LLC

1. **Outfall 001** - treated sanitary wastewater (estimated flow is 500 GPD)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	LAC33:IX.2707.1.1.b
BOD ₅	30	45	Similar discharges* (BPJ), LAG530000
TSS	30	45	Similar discharges* (BPJ), LAG530000
Fecal Coliform colonies/100ml	200	400	Similar discharges* (BPJ), LAG530000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG530000

Treatment: sewage treatment plant

Monitoring Frequency: Semiannually for all parameters at the point of discharge from the sewage treatment plant, located southwest of the office, prior to mixing with other waters.

Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other industrial facilities and the Class I Sanitary Discharge General permit, LAG530000 effective December 1, 2007.

2. **Outfall 002** - treated sanitary wastewater (estimated flow is 500 GPD)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	LAC33:IX.2707.1.1.b
BOD ₅	30	45	Similar discharges* (BPJ), LAG530000
TSS	30	45	Similar discharges* (BPJ), LAG530000
Fecal Coliform colonies/100ml	200	400	Similar discharges* (BPJ), LAG530000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG530000

Treatment: sewage treatment plant

Monitoring Frequency: Semiannually for all parameters at the point of discharge from the sewage treatment plant, located southwest of the fabrication shop, prior to mixing with other waters.

Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other industrial facilities and the Class I Sanitary Discharge General Permit, LAG530000 effective December 1, 2007.

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3. Outfall 003: equipment washwater and hydrostatic test wastewater

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	LAC33:IX.2707.I.1.b
COD	200	300	Similar discharges*, LAG480000 (BPJ)
TSS	---	45	Similar discharges*, LAG480000 (BPJ)
Oil & Grease	---	15	Similar discharges*, LAG480000 (BPJ)
Soaps & Detergents	Inventory Record	---	Similar discharges*, LAG480000 (BPJ)
Oil & Grease, Visual	---	No Presence	Similar discharges*, LAG480000 (BPJ)
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges*, LAG480000 (BPJ)

Treatment: Oil/water separator

Monitoring Frequency: Daily for Oil and Grease, Visual and quarterly for Flow, TSS, COD, Oil and Grease, and pH, at the point of discharge from the oil water separator, located west of the office, prior to mixing with other waters.

Soaps and Detergents: Document in a quarterly inventory record the quantity and type of any soap and/or detergent used during each calendar month.

Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other facilities and the Light Commercial General Permit, LAG480000, effective August 1, 2001.

* Existing permits for similar outfalls
 BPJ Best Professional Judgement
 s.u. Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.h, facilities classified as SIC code 3499 are not considered to have storm water discharges associated with industrial activity unless they have "vehicle maintenance shops, equipment cleaning operations, or airport deicing operations." This facility does have vehicle maintenance shops and equipment cleaning operations.

For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance,** the SWP3 shall be

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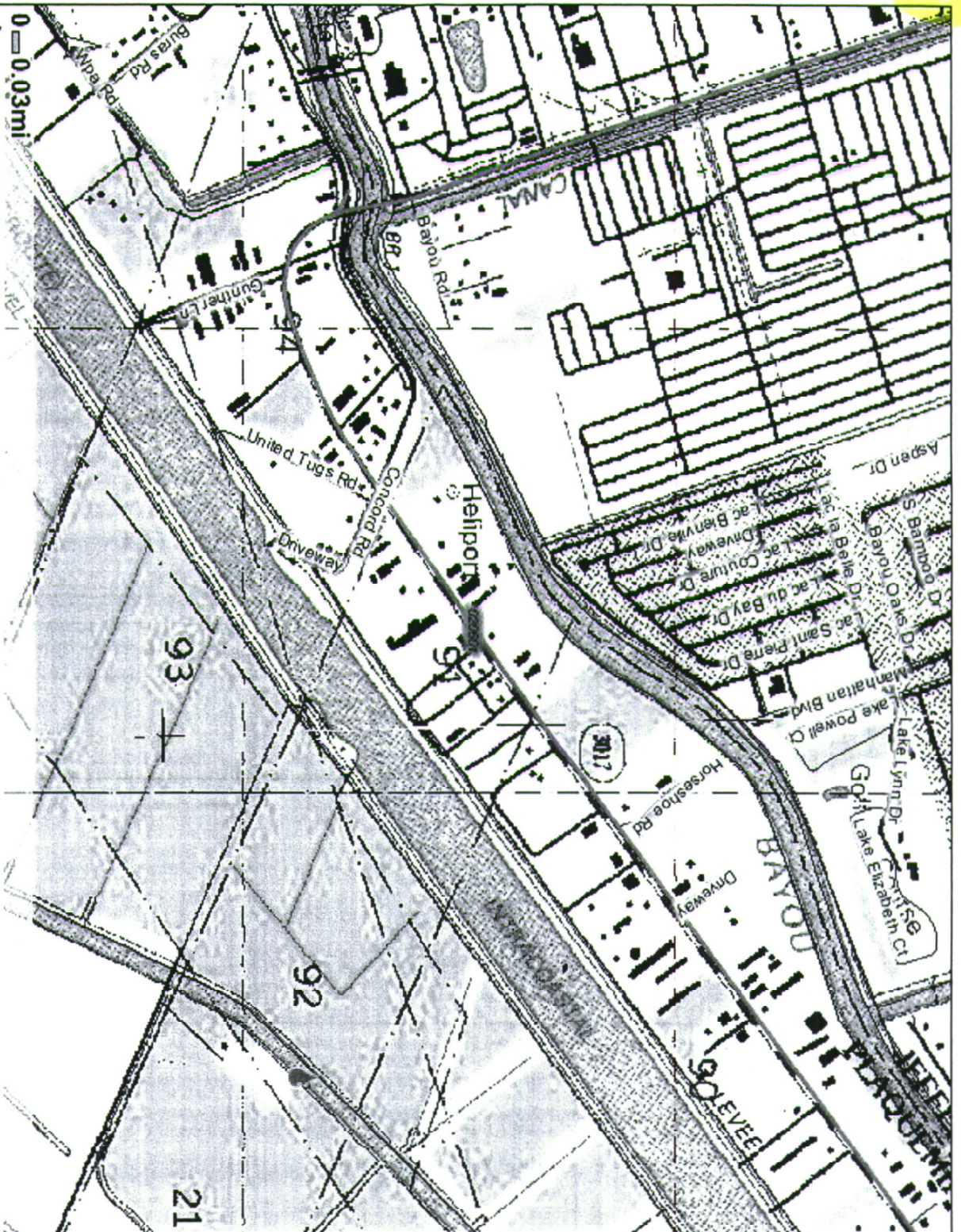
reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).



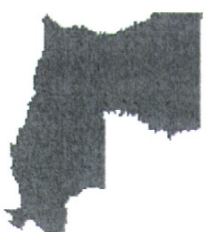
October 21, 2009

LDDEQ Disclaimer:

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LDDEQ Interactive Mapping



- USGS GNIS WATER
- GDT ROADS
- Interstate Highway
- US Highway
- LA Highway
- Major Highway
- Major Road
- Ramp
- Local Road
- LDOTD US HIGHWAYS 1999
- ESRI GDT STREAMS
- USGS DLG PERENNIAL STREAM
- USGS DLG INTERMITTENT STREAM
- LDDEQ Lakes 1999
- LDDEQ SUBSEGMENTS 2006
- LDOTD PARISHES
- LDOTD LA BOUNDARY
- State DRG 1:24k